

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

RYAN, LLC,

Plaintiff,

CHAMBER OF COMMERCE, *et al.*,

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

CASE NO.: 3:24-CV-986

**DEFENDANT’S UNOPPOSED MOTION TO  
AMEND BRIEFING SCHEDULE**

On July 9, 2024, the parties filed a joint status report proposing a schedule to govern briefing on the parties’ forthcoming cross-motions for summary judgment that will facilitate the Court’s intended disposition on the merits of this action by August 30, 2024. Joint Status Report (“JSR”), ECF No. 155. On July 10, 2024, the Court adopted a schedule that largely reflected Defendant’s proposal. Order, ECF No. 156; *see* JSR at 3-4. Counsel for Defendant subsequently recognized, however, that counsel mistakenly proposed a deadline of July 26, 2024, for Defendant’s consolidated cross-motion for summary judgment and opposition to Plaintiff’s and Plaintiff Intervenors’ motions for summary judgment. Defendant intended instead to propose a deadline of August 2,

2024, for that filing. Accordingly, Defendant respectfully requests that the Court amend the briefing schedule to set a deadline of **August 2, 2024**, for Defendant's consolidated cross-motion for summary judgment and opposition to Plaintiff's and Plaintiff Intervenors' motions for summary judgment. Plaintiff and Plaintiff-Intervenors take no position on this motion. For the following reasons, good cause supports Defendant's requested amendment to the briefing schedule:

1. Under the schedule that Defendant intended to propose and now seeks, Plaintiff and Plaintiff-Intervenors' opening summary judgment briefs would be due **more than two weeks** after the Court's decision on Plaintiff and Plaintiff-Intervenors' preliminary injunction motions, in which the Court directed the parties to propose a summary judgment briefing schedule to facilitate a merits disposition by August 30, 2024. Defendant's opening summary judgment brief would be due **two weeks** thereafter; Plaintiff and Plaintiff-Intervenors' closing summary judgment briefs would be due **one week** thereafter; and Defendant's closing summary judgment brief would be due **one week** thereafter. Defendant's proposed schedule thus equitably allocates the expedition of the default summary judgment briefing schedule that is necessary to facilitate a decision by August 30, 2024.

2. The briefing schedule adjustment that Defendant seeks is necessary to allow Defendant to adequately respond to the arguments that Plaintiff and Plaintiff-Intervenors raise in their opening summary judgment brief.

3. Defendant's requested amendment to the briefing schedule would not affect any other briefing deadlines in this action or impede the Court's intended resolution of the parties' forthcoming cross-motions by August 30, 2024.

4. As noted, Plaintiff and Plaintiff-Intervenors take no position on this request.

For these reasons, Defendant respectfully requests that the Court amend the briefing schedule entered on July 10, 2024, to require Defendant to file its consolidated cross-motion for summary judgment and opposition to Plaintiff's and Plaintiff Intervenors' motions for summary judgment by **August 2, 2024**.

Dated: July 11, 2024

Respectfully submitted,

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LESLEY R. FARBY  
Assistant Branch Director

/s/ Taisa M. Goodnature

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### **CERTIFICATE OF WORD COUNT**

This document complies with the Court's word count requirement because it contains 420 words.

Dated: July 11, 2024

/s/ Taisa M. Goodnature

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### **CERTIFICATE OF SERVICE**

On July 11, 2024, I electronically filed the above motion with the clerk of court for the U.S. District Court, Northern District of Texas. I certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Taisa M. Goodnature

Taisa M. Goodnature